

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MILLENNIUM FUNDING, INC., et al,

Plaintiffs,

v.

WICKED TECHNOLOGY LIMITED et al.,

Defendants.

Civil Action No. 1:21-cv-00282-RDA-TCB

JOINT NOTICE OF TENTATIVE SETTLEMENT

Plaintiffs MILLENNIUM FUNDING, INC., EVE NEVADA, LLC, HUNTER KILLER PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., GUNFIGHTER PRODUCTIONS, LLC, MILLENNIUM IP, INC., VOLTAGE HOLDINGS, LLC, KILLING LINK DISTRIBUTION, LLC, LHF PRODUCTIONS, INC., RAMBO V PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., WONDER ONE, LLC and 42 VENTURES, LLC (“Plaintiffs”) and Defendants WICKED TECHNOLOGY LIMITED, VPN.HT Limited, MOHAMED AMINE FAOUANI (“The Wicked Defendants”)(all collectively, “Parties”) provide notice to the Court that they have arrived at a tentative settlement of all claims. The Parties request that the Court stay ruling on The Wicked Defendants’ pending Motion to Dismiss [Doc. #29] while they work to finalize and effectuate their tentative settlement.

For the avoidance of doubt, this Notice does not apply to Plaintiffs’ Motion for Default Judgment [Doc. #42] against Defendant Doe d/b/a POPCORNTIME.APP.

Dated: Aug. 30, 2021

Respectfully submitted,

/s/ Kerry S. Culpepper

Kerry S. Culpepper,
Virginia Bar No. 45292
CULPEPPER IP, LLC
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawai'i 96740
Tel.: (808) 464-4047
Fax.: (202) 204-5181
Email: kculpepper@culpepperip.com
Counsel for Plaintiffs

/s/Benjamin E. Maskell/

Benjamin E. Maskell, Esquire
Va. State Bar No. 78791
MASKELL LAW PLLC
937 N. Daniel St.
Arlington, VA 22201
Telephone: (703) 568-4523
Email: Ben@MaskellLaw.com
*Counsel for Defendants Wicked Technology
Limited, VPN.HT Limited, and Mohamed
Amine Faouani*

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2021, a true and correct copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

Benjamin E. Maskell, Esquire
MASKELL LAW PLLC
937 N. Daniel St.
Arlington, VA 22201
Email: Ben@MaskellLaw.com
*Counsel for Defendants Wicked Technology
Limited, VPN.HT Limited, and Mohamed
Amine Faouani*